

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

23-CR-80219-AMC

UNITED STATES OF AMERICA

v.

MICHAEL GORDON DOUGLAS,

Defendant,

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**DEFENDANT'S *UNOPPOSED* MOTION TO EXTEND DUE DATE  
FOR PRETRIAL MOTIONS**

COMES NOW the Defendant, Michael Gordon Douglas, by and through his undersigned attorney, and respectfully requests that this Honorable Court enter an Order continuing the due date for pretrial motions for three weeks, from June 14, 2024, to July 5, 2024, or such other date as suits this Court's calendar. Calendar call in this matter is currently set for September 3, 2024, at 1:45 p.m. Trial is currently scheduled for September 9, 2024.

The reason for the defendant's request is that the defense is still reviewing the extensive evidence provided by the government in this case and wishes to preserve the government's opening plea offer to determine whether the defendant should plead guilty in this matter. The defendant is not seeking a continuance of either the trial call or the trial date in this matter.

Undersigned counsel has conferred with AUSA Gregory Schiller, Esq. who has no objection to the extension requested herein. Defendant Michael Gordon Douglas has no objection to this request for extension and waives any statutory or Rule of Criminal Procedure that exists in order to obtain this continuance.

The defendant also agrees that the provisions of the Speedy Trial Act, 18 U.S.C. Sections 3161 – 3174, shall continue to be tolled during the three weeks requested by this extension.

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an Order extending the due date for pretrial motions to July 5, 2024, within which time defense counsel can further investigate this matter and either prepare those motions and pleadings necessary to protect and preserve the Defendant's rights or enter into a plea agreement with the government.

Dated this 12th day of June 2024

Respectfully submitted,

/s/ John D. Kirby, Esq.

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Attorneys for Michael Gordon Douglas

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Unopposed Motion for has been furnished by Electronic Delivery using CM/ECF and to Assistant United States Attorney Gregory Schiller, Esq. at [Gregory.schiller@usdoj.gov](mailto:Gregory.schiller@usdoj.gov), to John D. Kirby, Esq. at [jkirby@johnkirbylaw.com](mailto:jkirby@johnkirbylaw.com) this 12<sup>th</sup> day of June, 2024.

John R. Howes, Esq.  
John R. Howes, Esq.